

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Exhibit "J"

MICHAEL PARGA, *et al.*,)
)
Plaintiffs,)
v.) Case No.: 18-CV-0298-CVE-JFJ
)
BOARD OF COUNTY COMMISSIONERS)
OF THE COUNTY OF TULSA, *et al.*,)
)
Defendants.)

AFFIDAVIT OF DR. WILLIAM COOPER

I, William Cooper, D.O., being of legal age and being first duly sworn, attest and state as follows:

1. I am a doctor of osteopathy licensed to practice in the State of Oklahoma.
2. Turn Key Health Clinics, LLC ("Turn Key") contracts with the Tulsa County Board of County Commissioners to provide health care services within the David L. Moss Criminal Justice Center ("the Jail" or "Tulsa County Jail").
3. I am currently employed by Turn Key as Chief Medical Officer, in which capacity I supervise the medical services Turn Key provides at the Tulsa County Jail.
4. The statements contained herein are based on my personal knowledge, as well as my education, training, and expertise.
5. At this time, there are no suspected or confirmed cases of Covid-19 at the Tulsa County Jail.
6. In my professional opinion, there is no heightened risk of imminent harm from Covid-19 at the Tulsa County Jail compared to the risk to free civilians in communities outside of the Jail.

7. Additionally, it is my professional opinion that an inmate who shows symptoms of or is suspicious for Covid-19 inside of the Jail is likely to receive prompt treatment and testing, as well as direct observation of symptoms similar to what an individual would receive outside of the Jail.

8. In the event an inmate developed symptoms of Covid-19 and such symptoms showed a worsening in condition, we would quickly transfer that inmate to a hospital in the local community for advanced treatment.

9. Based on guidance from the National Commission for Correctional Health Care ("NCCHC"), the Centers for Disease Control and Prevention ("CDC"), the World Health Organization ("WHO"), and local governmental authorities, agencies, and health departments, Turn Key has taken significant action in anticipation of and reaction to the Covid-19 pandemic.

10. These measures include, among others, the following steps:

a. Enhanced Screening Measures.

i. Tulsa County contracted with Turn Key for Turn Key to provide an additional one hundred sixty-eight (168) hours of CNA/CMA coverage (totaling to 4.2 full time employees) per week to provide additional medical services at the Jail for the duration of the Covid-19 pandemic.

ii. Turn Key has implemented a Coronavirus Screening Tool based on CDC and NCCHC guidance that is uniformly used by our medical staff on every individual who enters the Jail.

iii. Consistent with such guidance, the screening tool is designed to identify both asymptomatic and symptomatic carriers of Covid-19.

iv. Turn Key staff screen every individual (including incoming

inmates, medical employees, detention employees, vendors, etc.) who enters the Tulsa County Jail facility for risk of Covid-19.

v. Employees, visitors, and/or vendors who are symptomatic or are suspicious for Covid-19 are refused further entry to the premises.

vi. Consistent with guidance, Turn Key employees who are sent home are required to be fever free for a minimum of 72 hours without the assistance of medication and at least seven days have passed since the onset of symptoms, before they are permitted to return to the Jail.

b. Intake Cells.

i. Inmates who are booked into the Jail are automatically placed into single cells for a minimum 14-day observation period to prevent the risk of spread of Covid-19. This includes asymptomatic inmates.

ii. The Jail has allocated eight negative pressure cells in the Jail's Medical Housing Unit where an inmate who has a suspected case of Covid-19 will receive medical treatment while quarantined.

c. Staffing and Tele-Medicine Operations.

i. Turn Key has nurse staffing that is physically present at the Jail at all times, 24 hours per day, seven days per week.

ii. Turn Key also employs a full time Medical Director physician at the Jail, as well as two full time midlevel providers.

iii. There is always at least one medical provider on call to attend to medical issues at the Jail.

iv. In addition, the County and Turn Key are currently in discussions

regarding logistics on how to provide Turn Key medical services at the Jail through the use of tele-medicine within the Jail to enhance the level of protection afforded to patients and health staff.

d. Personal Protective Equipment (PPE).

i. Tulsa County Jail has a current stock of PPE masks for symptomatic inmates and new intakes.

ii. Turn Key has stocked and is continuing to acquire PPE to protect employees and inmates, and to effectively minimize the risk of transmission of Covid-19 within the Jail.

iii. More specifically, medical staff who will interact with suspected Covid-19 patients will don PPE gear.

iv. In response to the global shortage of PPE effecting all healthcare providers alike – whether they are at hospitals, clinics, or in the correctional setting, Turn Key and Tulsa County are in the process of setting up a UVC sterilization room for the purpose of sterilizing PPE to extend their lifespan.

e. Continuously Modifying Practices According to New Guidance.

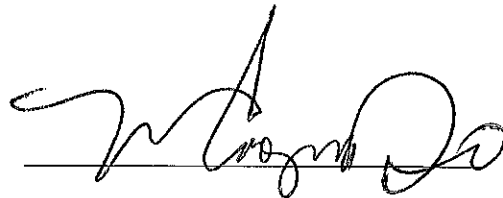
i. In addition to the foregoing measures, Turn Key's corporate leadership team tracks all updated guidance from the CDC, WHO, NCCHC, state and local governments, agencies, and health departments.

ii. When new guidance, recommendations, or requirements are disseminated, Turn Key constantly modifies its practices and procedures to remain compliant and current with the same as much as is practicable.

11. We are continuously monitoring operations at the Jail and the Covid-19 pandemic. If the risk level were to change at the Tulsa County Jail, we would re-evaluate and would discuss any such issues with the County.

12. In my experience, the County has worked and communicated well with us to take steps to aggressively reduce the risk of widespread Covid-19 infection in their Jail, including recently releasing a large number of inmates.

AFFIANT FURTHER SAITH NOT.


William Cooper, D.O.

STATE OF OKLAHOMA)
COUNTY OF Oklahoma) ss.
)

SUBSCRIBED and sworn before me this 9 day of April, 2020.




Notary Public

My commission expires:

10-16-2023